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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TANISHA R. MANUEL, an individual,

Plaintiff,

vs.

DIGNITY HEALTH, a foreign corporation,
Does I-X and Roes I-X

Defendant.

Case No. 2:18-cv-01959-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
STIPULATION OF DISMISSAL**

Plaintiff Tanisha R. Manuel (“Plaintiff”) and Defendant Dignity Health (“Defendant”), by and through their respective counsel, respectfully request that the Court extend the deadline for the parties to file a stipulation of dismissal (EFC No. 18) by two weeks, until May 2, 2019. In support of this request, the parties state as follows:

1. The parties reached a resolution of this matter at the Early Neutral Evaluation session on March 14, 2019.
2. On March 18, 2019, Defendant sent a proposed settlement agreement and release reflecting the resolution requesting IRS W-9 forms from Plaintiff as required by the agreement.
3. On March 19, 2019, Plaintiff responded with proposed changes to the agreement, but did not provide the required W-9 forms.
4. Plaintiff’s counsel became sick and was out of the office for several days during which time Defense Counsel attempted to reach Plaintiff’s counsel via email and telephone on several occasions, finally providing discussion points in writing to Plaintiff’s counsel and again

1 requesting a response.

2 5. When Plaintiff's counsel returned to the office, a call was scheduled on March 27,
3 2019, at which time the parties discussed the agreement. Following the call, Defense Counsel sent
4 a revised agreement to Plaintiff's counsel pursuant to the parties' discussion.

5 6. On April 5, 2019, Plaintiff's counsel provided a copy of the signature page of the
6 settlement agreement signed by Plaintiff. However, Defendant's Counsel believed the signature
7 page did not match the signature page of the revised version of the agreement.

8 7. On April 10, 2019, Plaintiff's counsel provided the W-9 forms.

9 8. On April 15, 2019, Plaintiff's counsel explained that the content of the agreement
10 signed by Plaintiff was identical to the version sent by Defendant, but that a formatting issue caused
11 a difference in page length.

12 Because Defendant did not receive W-9 forms until April 10, 2019, and the parties did not
13 resolve the discrepancy in the signature pages until April 15, 2019, settlement could not be
14 completed by April 18, 2019. Accordingly, the parties respectfully request that the Court extend
15 the deadline for the parties to file a stipulation of dismissal by two weeks, until May 2, 2019.

16 Dated this 18th day of April, 2019.

17 NELSON LAW

JACKSON LEWIS P.C.

18 /s/ Sharon L. Nelson
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22 *Tanisha Manuel*

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23 **ORDER**

24 IT IS HEREBY ORDERED that the deadline for the parties to file a stipulation of
25 dismissal is extended to and including Thursday, May 2, 2019.

26 Dated this 18th day of April, 2019.

27 
28 ~~District~~ U.S. Magistrate Judge